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October 18, 2022

*Via ECF*

Hon. James L. Garrity, Jr.  
US Bankruptcy Court  
One Bowling Green  
New York, NY 10004-1408

Re: Genever Holdings LLC - Case No. 20-12411-JLG  
Status letter – October 25, 2022 Status conference/Hearing on Motion to Change Venue

Dear Judge Garrity:

I write to bring the Court up to date in advance of the status conference scheduled for October 25, 2022. As discussed at the last hearing on September 27, 2022, the Debtor and the Trustee in Miles Kwok's Chapter 11 case have moved to change venue of this bankruptcy case to Connecticut. By the end of today the matter will be fully briefed, and the parties will be ready to argue the motion on October 25.

The Sales Officer continues in her efforts to market the apartment. A proposed stipulation and order extending the marketing period through October 31, 2022 was filed on the ECF docket [No. 205], and remains *sub judice*. Discussion of further extensions will turn, in part, on the venue motion.

Administratively, the parties are transitioning to the Trustee's control of the DIP account. This has delayed the filing of the operating reports, but the July and August reports have now been filed and we hope to prepare and file the September report before the hearing, as soon as we receive a copy of the bank statement. The insurance was renewed this past week and full coverage remains in place.

Respectfully yours,

/s/ J. Ted Donovan

cc: Richard Morrissey, Esq. (Via ECF and email)  
Francis Lawall, Esq. (Via ECF and email)  
Hon. Melanie Cyganowski (Ret.) (Via ECF and email)  
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